

## Remarks

### The amendments to claims 1 and 25

The amendments are fully supported by the Specification as filed. In particular, FIG. 2 of the application shows a version of aggregated entries in which the aggregated entry is in another table rather than in the table whose entries are being aggregated and FIG. 4 shows a version of aggregated entries in which the aggregated entry is in the same table as the entries that are being aggregated.

### The rejection under 35 U.S.C. 112, par. 2

- Applicants have changed "may have" to "is capable of having", which should remedy Examiner's difficulties with the use of "may".

### Traversal of the rejection under 35 U.S.C. 102

- A rejection under 35 U.S.C. 102 requires that the reference upon which the claim is rejected disclose all of the claim's limitations. The following traversal will begin with the limitations of claim 1 and will then discuss the disclosure of Langevin with reference to claim 1.

### *What Applicant is claiming*

Applicants' claim 1 as amended sets forth what Applicant is claiming:

1. (currently amended) A method of aggregating a plurality of entries in a table in a database management system into an aggregated entry in the table or another table in the database management system, the method comprising the steps of:
  - making the aggregated entry, the aggregated entry representing the plurality of entries and including a field whose value is a representation of a set that is capable of having a plurality of members; and
  - deriving members of the set from values contained in entries belonging to the plurality thereof.

- As clearly set forth in the claim, the method of claim 1 "aggregate[s] a plurality of entries in a table in a database management system into an aggregated entry in the table or another table in the database management system". The method then describes making the "aggregated entry", which represents the "plurality of entries" and includes "a field whose value is a representation of a set" and "deriving members of the set from values contained in entries belonging to the plurality thereof". As is clear from the foregoing, all of the "entries" which are involved in the method are entries in tables in a database management system.

*What Langevin discloses*

Langevin's disclosure is well-summarized by his *Abstract*:

5       The automatic generation and storage of bundled error messages indicative of fault conditions of one or more managed networks is disclosed ... Fewer duplicative error messages are generated and the number of "false positive" messages is reduced while still preserving and providing important fault condition information to operators.

10       FIG. 1, described beginning at paragraph [0032], provides an overview of his system. An auto-ticket generator (ATG) server 24 is connected to an ATG database 26 and to a network operations center for a set of front-ends 32 for a set of remote devices 34. The network operations center includes one or more ATG generator clients 23, which communicate with ATG server 24. Each of the network front ends have network monitoring devices which monitor the remote devices attached to the front end and send messages concerning the monitored devices to an ATG client 23. The ATG client 23 processes the messages into trouble tickets and sends them to ATG generator server 24, which stores information in the trouble tickets in ATG database 26. An important feature of Langevin's system is that it does not produce a trouble ticket for each message, but instead combines messages about the same problem into a single trouble ticket. The combination happens at two levels: at the first level, 20       the ATG client combines related messages into a single message (Langevin [0054]) and sends the message to the ATG server in a request to automatically generate a trouble ticket (Langevin [0036]). At the second level, when the ATG server receives the trouble ticket generation request, it checks to see whether there is already a trouble ticket for the problem in database 26. If there is, the information in the request is "appended into to the pre-existing trouble ticket" 25       (Langevin [0037]).

It should be pointed out here that neither in FIG. 1 nor anywhere else in Langevin is there any disclosure of the organization of ATG database 26 or the organization of the tables contained in the database. Put another way, there is nothing in Langevin which corresponds in any way to 30       Applicants' FIGs. 1-5, which are all about the organization of databases that contain rolled up information and the organization of the tables that contain the rolled up information.

*Patentability of claim 1 over Langevin*

Claim 1 is patentable over Langevin because Langevin does not disclose the following limitations of claim 1:

- Claim 1 requires that the aggregation operation "aggregat[es] a plurality of entries in a table in a database management system into an aggregated entry; in Langevin, the information that is aggregated comes from outside ATG database 25. There is no further aggregation of information once the information is in ATG database 25.
- Claim 1 requires that the aggregated entry "include[e] a field whose value is a representation of a set that is capable of having a plurality of members"; there is simply no disclosure at all in Langevin of the organization of the information in ATG database 25.
- Claim 1 requires that "members of the set [are derived] from values contained in entries belonging to the plurality thereof"; as already set forth, Langevin does not disclose aggregation of information within ATG database 25 and also does not disclose "a field whose value is a representation of a set"

Because Langevin discloses none of the above limitations of claim 1, it does not anticipate the claim and the claim cannot be rejected on the basis of the reference. For the same reason, Langevin does not anticipate claim 25.

#### *Rebuttal of Examiner's arguments*

Examiner finds the step of making the aggregated entry in Langevin's FIG. 10a; however, what that figure discloses is what happens when Auto-ticket generator server 24 receives a trouble ticket request message from an auto-ticket generator client 23 and determines that a trouble ticket already exists. In that case, the new data is "added to the prior trouble ticket" (FIG. 10(a), element 158), but the new data does not come from other entries in ATG database 25, as required for anticipation of Applicants' claim.

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For the "field whose value is a representation of a set that may have a plurality of members", Examiner refers Applicants to FIGs. 14(a and b), but the discussion at [0088] of the reference makes it clear that what is shown here is a display of results of a query of ATG database 25 by customer name. The fields shown in FIGs. 14(a and b) furthermore all have scalar values.

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For the step of "deriving members of the set from values contained in entries belonging to the plurality thereof", Examiner cites FIG. 6, element 93 and paragraph [0054], lines 21-25. What FIG. 6, element 93 and the cited location disclose, however, is the technique used by auto-ticket

generator client 23 to combine a number of messages about the same problem into a single trouble ticket request. Again, the information being combined does not come from other entries in ATG database 25, as required for anticipation of Applicants' claim.

5 *The dependent claims*

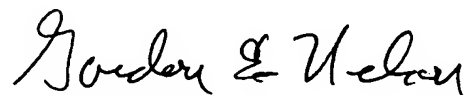
The dependent claims are of course all patentable over Langevin because the reference fails to disclose all of the limitations of the independent claims and consequently cannot disclose all of the limitations of the dependent claims; however, as one would expect from the diversity of purpose between the Langevin's trouble ticket system and the roll up system in which Applicants' invention is implemented and from the total lack of disclosure concerning the organization of ATG database 25, the added limitations of the dependent claims are also not disclosed in Langevin.

Beginning with claim 2, there is no disclosure in Langevin of anything at all being deleted in ATG database 25. Claims 3-6 have to do with the representation of the set employed in Applicants' invention; there is no representation of a set disclosed in Langevin. Claims 7 and 8 concern the values belonging to the set; again, there is no representation of a set disclosed in Langevin. Thus, these claims and the corresponding claims 26-32 are all patentable in their own rights over Langevin.

20 **Conclusion**

Applicants have demonstrated that their amended claims are fully supported by the Specification as filed. The amendment has overcome the rejection under 35 U.S.C. 112, second paragraph. Applicants have further traversed Examiner's rejection of claims 1-8 and 25-32 as anticipated by Langevin. Applicants have thus been completely responsive to all of Examiner's rejections, as required by 37 C.F.R. 1.111(b) and respectfully request that Examiner continue with the examination and allow the claims as amended. No fees are believed to be required by way of this response; if any should be, please charge them to deposit account number 501315.

30 Respectfully submitted,



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